



Received & Inspected

FEB 27 2012

FCC Mail Room

February 23, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW,  
Room TW-A325  
Washington, DC 20554

**Re: Certification of CPNI Filing for Year 2011  
EB Docket No. 06-36**

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's rules, is the original and four copies of a compliance certificate and accompanying statement for the year ended December 31, 2011, for Light Tower Fiber LLC, Light Tower Fiber Long Island LLC, Hudson Valley DataNet, LLC, New Jersey DataNet Telecom, LLC, Connecticut DataNet, LLC, Verosity Technology Partners, LLC, CCG Communications, LLC, and Open Access Acquisition LLC, each of which is an affiliated subsidiary of Light Tower Holdings LLC.

Should you have any questions regarding the attached response, please call me at (978) 264-6042 or contact me by email at [jharrington@lighttower.com](mailto:jharrington@lighttower.com).

Sincerely,



Joseph L. Harrington, III  
Assistant General Counsel

Enclosures

FEB 27 2012

FCC Mail Room

Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template  
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

1. Date filed: February 23, 2012

2. Name of company(s) covered by this certification:

The following affiliated subsidiaries of Light Tower Holdings LLC:

Light Tower Fiber LLC

Light Tower Fiber Long Island LLC

Hudson Valley DataNet, LLC

New Jersey DataNet Telecom, LLC

Connecticut DataNet, LLC

Verosity Technology Partners, LLC

CCG Communications, LLC

Open Access Acquisition LLC [Open Access Inc. was acquired and merged into Open Access Acquisition LLC on March 31, 2011]

3. Form 499 Filer ID:

Light Tower Fiber LLC	827895
Light Tower Fiber Long Island LLC	824812
Hudson Valley DataNet, LLC	822792
New Jersey DataNet Telecom, LLC	825779
Connecticut DataNet, LLC	825280
Verosity Technology Partners, LLC	826951
Open Access Acquisition LLC	825608

4. Name of signatory: Robert J. Shanahan

5. Title of signatory: Chief Executive Officer

6. Certification:

I, Robert J. Shanahan, certify that I am an officer of Light Tower Holdings, LLC the company named above, and acting as an agent of the company, that I have personal knowledge that each of the affiliated subsidiaries listed above has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying Statement explaining how each company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

None of the listed companies has taken actions ( i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. I understand that companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

None of the listed companies has received any customer complaints in the past year concerning the unauthorized release of CPNI. The attached Statement reflects this fact in reporting information regarding the number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.

Signed: 

Title: Chief Executive Officer

Date: \_\_\_\_\_

## STATEMENT

Light Tower Holdings LLC ("Light Tower") has established a procedure for each of its affiliated subsidiaries, including Light Tower Fiber LLC, Light Tower Fiber Long Island LLC, Hudson Valley DataNet, LLC, New Jersey DataNet Telecom, LLC, Connecticut DataNet, LLC, Verosity Technology Partners, LLC, CCG Communications, LLC, and Open Access Acquisition LLC to protect any Customer Proprietary Network Information ("CPNI"). The Light Tower procedure:

1. States that the policy of Light Tower is that "any CPNI will not be used for the purpose of marketing services, other than by affiliates of Light Tower when marketing a Light Tower service to a Light Tower customer."
2. Light Tower educates and trains its employees regarding the appropriate use of any CPNI and has established disciplinary procedures should an employee violate the CPNI procedure established by Light Tower.
3. Light Tower maintains a record of its and its affiliates' sales and marketing campaigns. No CPNI information has been used in these sales and marketing campaigns. Light Tower's policy is that "Light Tower will not use any CPNI in any sales or marketing campaign."
4. To Light Tower's knowledge, no Light Tower CPNI has been accessed or obtained by any data broker in 2011, nor by any other third party. Light Tower is not aware of any unauthorized release of any CPNI, and no customer of Light Tower has complained regarding unauthorized disclosure of CPNI.
5. The following is information Light Tower has with respect to the processes pretexters are using to attempt to access CPNI, and (if any) what steps Light Tower is taking to protect CPNI:
  - a. To my knowledge, no pretexter has attempted to access or obtain any CPNI from Light Tower in 2011.
6. The following is a summary of customer complaints received in 2011 regarding unauthorized release of CPNI:
  - a. Number of customer complaints Light Tower received in 2011 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: None.
  - b. Category of complaint:
    - 1) Zero Number of instances of improper access by employees.
    - 2) Zero Number of instances of improper disclosure to individuals not authorized to receive the information.

- 3) Zero Number of instances of improper access to online information by individuals not authorized to view the information.
  - 4) Zero Number of other instances of improper access or disclosure.
  - 5) Description of instances of customer complaints, or of improper access or disclosure: Not Applicable.
7. Light Tower's Legal Department provides advice and counsel regarding compliance with the CPNI rules.



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EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

1. Date filed: February 23, 2012

2. Name of company(s) covered by this certification:

The following affiliated subsidiaries of Light Tower Holdings LLC:

Light Tower Fiber LLC

Light Tower Fiber Long Island LLC

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4. Name of signatory: Robert J. Shanahan

5. Title of signatory: Chief Executive Officer

6. Certification:

I, Robert J. Shanahan, certify that I am an officer of Light Tower Holdings, LLC the company named above, and acting as an agent of the company, that I have personal knowledge that each of the affiliated subsidiaries listed above has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying Statement explaining how each company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

None of the listed companies has taken actions ( i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. I understand that companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

None of the listed companies has received any customer complaints in the past year concerning the unauthorized release of CPNI. The attached Statement reflects this fact in reporting information regarding the number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.

Signed: 

Title: Chief Executive Officer

Date: \_\_\_\_\_

## STATEMENT

Light Tower Holdings LLC ("Light Tower") has established a procedure for each of its affiliated subsidiaries, including Light Tower Fiber LLC, Light Tower Fiber Long Island LLC, Hudson Valley DataNet, LLC, New Jersey DataNet Telecom, LLC, Connecticut DataNet, LLC, Verosity Technology Partners, LLC, CCG Communications, LLC, and Open Access Acquisition LLC to protect any Customer Proprietary Network Information ("CPNI"). The Light Tower procedure:

1. States that the policy of Light Tower is that "any CPNI will not be used for the purpose of marketing services, other than by affiliates of Light Tower when marketing a Light Tower service to a Light Tower customer."
2. Light Tower educates and trains its employees regarding the appropriate use of any CPNI and has established disciplinary procedures should an employee violate the CPNI procedure established by Light Tower.
3. Light Tower maintains a record of its and its affiliates' sales and marketing campaigns. No CPNI information has been used in these sales and marketing campaigns. Light Tower's policy is that "Light Tower will not use any CPNI in any sales or marketing campaign."
4. To Light Tower's knowledge, no Light Tower CPNI has been accessed or obtained by any data broker in 2011, nor by any other third party. Light Tower is not aware of any unauthorized release of any CPNI, and no customer of Light Tower has complained regarding unauthorized disclosure of CPNI.
5. The following is information Light Tower has with respect to the processes pretexters are using to attempt to access CPNI, and (if any) what steps Light Tower is taking to protect CPNI:
  - a. To my knowledge, no pretexter has attempted to access or obtain any CPNI from Light Tower in 2011.
6. The following is a summary of customer complaints received in 2011 regarding unauthorized release of CPNI:
  - a. Number of customer complaints Light Tower received in 2011 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: None.
  - b. Category of complaint:
    - 1) Zero Number of instances of improper access by employees.
    - 2) Zero Number of instances of improper disclosure to individuals not authorized to receive the information.



- 3) Zero Number of instances of improper access to online information by individuals not authorized to view the information.
  - 4) Zero Number of other instances of improper access or disclosure.
  - 5) Description of instances of customer complaints, or of improper access or disclosure: Not Applicable.
7. Light Tower's Legal Department provides advice and counsel regarding compliance with the CPNI rules.